IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA

Reginald Evans Plaintiff, Vs **Cheryl M. Stanton, Executive Director of South Carolina Department of Employment and Workforce (DEW)** Defendants.	**CIVIL ACTION NO.____________** **COMPLAINT** **PLAINTIFF DEMAND BRENCH TRIAL**

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1. At all times hereinafter mentioned, plaintiff was and still is a resident of South Carolina.

2. The Defendants, Cheryl M. Stanton, Executive Director of South Carolina Department of Employment and Workforce (DEW) 1550 Gadsden Street, P.O. Box 995, Columbia, South Carolina 29202.

3. The jurisdiction this court is invoked pursuant to America with 1. Disabilities Act of 1990, as codified, 42 U.S.C 12112 – 12117 (amended by the ADA Amendments Act of 2008, Pub. L. No. 110-325 and the Civil Rights Act of 1991, Pub. L. No. 102-166). 2. Age Discrimination in Employment Act of 1967, as codified, 29 U.S.C. 621-634 (amended in 1984, 1990 and by the 3. Age Discrimination in Employment Amendments of 1986, Pub. L. No. 92-592, the Civil Rights of 1991, Pub.64 L. No. 102-166).

4. Title VII of the Civil Right Act of 1964, as codified, 42 U.S.C. 2000e to 2000e-17 (amended in 1972, 1978 and by the Civil Rights Act of 1991, Pub. L. No. 102-166). (Race, Color, gender, religion national origin).

4. Jurisdiction is specifically conferred upon the United States District Court by aforementioned statutes, as well as 28 U.S.C. 1331, 1343. Jurisdiction may also be appropriate under 42 U.S.C. 1981, 1983 and 1985(3), as amended by the Civil Rights Act of 1991, Pub. L. No. 102-166 and any related claims under South Carolina.

5. The discrimination conduct of which I complain in this action includes: a). Reduction in unemployment benefit b). failure to accommodate my disability and c).discrimination base of my race and color.

6. It is my best recollection that the alleged discriminatory acts occurred from February 18, 2016 to May 17, 2016.

7. I believe that the defendant is still committing these acts against me, by not having a good business reason not to award benefits.

8. Defendant discriminated against me based on my: race, color, disability and age. I was born 1963. At the time the Defendant discriminated against me, I was more than 40 years old.

9. The facts of my case are as follows:

   a. On February 18, 2016, Plaintiff filed for unemployment benefits.

   b. In April of 2016, the defendant reduced my benefit due to my medical condition.

c. In April of 2016, Defendant denied Plaintiff's employment benefits. The Plaintiff was place on permanent light duty by his Doctor January 8, 2016. The Plaintiff was seeking employment to match his medical condition and restrictions. The defendant still denied benefits in violation of the America Disability Act.

d. On May 2, 2015, The Defendant issue a final decision denying the Plaintiff unemployment benefit for no good business reason, therefore the Court should conclude the decision was based on race and because the Defendant has a history and Pattern of denying benefits to minorities.

10. WHEREFORE, plaintiff demands: Money damages in the amount of Three Hundred Thousand Dollars and zero cents. Plaintiff prays that the Court grant all relief as may be appropriate, including injunctive orders, damages, pre and post judgment interest, costs. All other further relief which court may deem appropriate.

May 17, 2015

Respectfully Submitted,

Reginald D. Evans
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